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17 FORT JAMES CORPORATION  
18 AND RELATED ENTITIES

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25 UNITED STATES DISTRICT COURT

26 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

27

28 CROWN PAPER LIQUIDATING  
TRUST,

Case No. C 02-3836 MMC  
Case No. C 05-0798 MMC

Plaintiff,

**STIPULATION AND ORDER  
CONTINUING DEFENDANTS'  
MOTIONS FOR ATTORNEYS' FEES  
PENDING COURT APPROVAL OF  
SETTLEMENT**

vs.

PRICEWATERHOUSECOOPERS LLP  
fka COOPERS & LYBRAND, et al.

Defendants.

Time: 9:00 a.m.  
Courtroom: 7 (19<sup>th</sup> Floor)  
Judge: Hon. Maxine M. Chesney

JEFFREY H. BECK, Liquidating Trustee  
of the Crown Paper Liquidating Trust,

W02-WEST:1TAC1\400257599.1

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STIPULATION AND [PROPOSED] ORDER  
CONTINUING DEFENDANTS' MOTIONS  
FOR ATTORNEYS' FEES PENDING  
COURT APPROVAL OF SETTLEMENT

Plaintiff.

VS.

FORT JAMES CORPORATION; FORT JAMES OPERATING COMPANY; FORT JAMES FIBER COMPANY; FORT JAMES INTERNATIONAL HOLDINGS LTD; AND MCGUIRE WOODS, LLP.

## Defendants.

9 Plaintiff Jeffrey H. Beck, Liquidating Trustee ("Plaintiff"), and defendants  
10 Fort James Operating Company, Fort James Fiber Company, and Fort James International  
11 Holdings, Ltd., (collectively, "Fort James Defendants") and McGuire Woods LLP ("MW,"  
12 and collectively with the Fort James Defendants, "Defendants", and collectively with the  
13 Fort James Defendants and Plaintiff, the "Parties") stipulate as follows and respectfully  
14 request that the Court enter the Parties' proposed order appended hereto.

16 WHEREAS, on July 12, 2004, the Court dismissed with prejudice Case  
17 No. 02-03836 in favor of MW;

19 WHEREAS, on December 14, 2006, the Court entered judgment in Case  
20 No. 05-0798 in favor of Defendants;

22 WHEREAS, on December 22, 2006, the Court approved the Parties'  
23 stipulation to defer briefing and hearing dates for Defendants' to-be-filed attorneys' fees  
24 motions;

26 WHEREAS, on January 26, 2007, MW and the Fort James Defendants each  
27 timely filed an attorneys fees motion (collectively, the "Attorneys Fees Motions"), and  
28 scheduled the hearings on the Attorneys Motions for March 2, 2007;

1           WHEREAS, after the Defendants filed the Attorneys Fees Motions, the  
2 Parties and other affected entities ("Others") reached an agreement in principle to settle all  
3 litigation between and among them, including this action and the Attorneys Fees Motions,  
4 and based thereon, the Parties stipulated to continue the hearing on the Attorneys Fees  
5 Motions to April 27, 2007 to allow the Parties and Others to document and obtain court  
6 approval of their settlement, which stipulation was approved by this Court (the "Prior  
7 Stipulation");

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9           WHEREAS, after entering into the Prior Stipulation, the Parties and Others  
10 (i) finalized the terms of and documented their settlement (the "Settlement"), which  
11 Settlement (if approved by the Court) will, among other things, render the Attorneys Fees  
12 Motions moot, and (ii) filed a motion to withdraw the reference (the "Motion to Withdraw  
13 Reference") on the motion to approve the Settlement (the "Settlement Motion"), which if  
14 granted will result in this Court deciding the Settlement Motion;

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16           WHEREAS, the Motion to Withdraw Reference is pending;

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18           WHEREAS, with the current hearing date of April 27, 2007 for the  
19 Attorneys Fees Motions, Plaintiff's oppositions to the Attorneys Fees Motions are due  
20 April 6, 2007 and Defendants' replies are due April 13, 2007, and the Parties wish to avoid  
21 the incurrence of additional fees with respect to the Attorneys Fees Motions;

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1 IT IS HEREBY STIPULATED AND AGREED that the hearing on the  
2 Attorneys Fees Motions shall be continued to June 15, 2007, and the briefing schedule for  
3 Plaintiff's oppositions and Defendants' replies shall be continued in accordance with the  
4 Local Rules for filing oppositions and replies.

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6 DATED: April 5, 2007

7 BEUS GILBERT PLLC  
8  
9 By /s/ Albert J. Morrison  
10 Albert J. Morrison  
11 Attorneys for Plaintiff  
12 DATED: April 5, 2007  
13 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP  
14  
15 By /s/ Theodore A. Cohen  
16 Theodore A. Cohen  
17 Attorneys for Fort James Defendants  
18 DATED: April 5, 2007  
19 KRIEG, KELLER, SLOAN, REILLEY & ROMAN LLP  
20  
21 By /s/ James C. Krieg  
22 James C. Krieg  
23 Attorneys for Def. MCGUIRE WOODS LLP  
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1 Good cause appearing,

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3 IT IS HEREBY ORDERED that the hearing on the Attorneys Fees Motions  
4 is continued to June 15, 2007, and the briefing schedule for Plaintiff's oppositions and  
5 Defendants' replies is continued in accordance with the Local Rules for filing oppositions  
6 and replies.

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8 The Court notes, however, that although the above-referenced "Motion to  
9 Withdraw Reference" may be "pending" in the Bankruptcy Court, said motion has not  
10 been docketed by the Clerk of the District Court and, accordingly, has not been assigned to  
11 a district court judge. See Bankruptcy Local Rule 5011-2(a) (providing that when motion  
12 to withdraw is filed with Clerk of Bankruptcy Court, Clerk of Bankruptcy Court "shall  
13 transmit the motion" to Clerk of District Court, which assigns the motion to district judge  
14 pursuant to Assignment Plan).

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16 DATED: April 6, 2007

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19 Hon. Maxine M. Chesney  
United States District Judge

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